

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
(EASTERN DIVISION)

In re:

WATER'S EDGE LIMITED  
PARTNERSHIP

Debtor.

Chapter 11

Case No. 24-12445 (CJP)

**NOTICE OF APPEARANCE  
AND REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure, the undersigned hereby appears as counsel for *DIV OA Lender, LLC* ("**DIV OA**") in this bankruptcy case:

Lynne B. Xerras, Esq.  
Holland & Knight LLP  
10 St. James Ave., 11<sup>th</sup> Floor  
Boston, Massachusetts 02116  
Telephone: (617) 523-2700  
Facsimile: (617) 523-6850  
Email: lynne.xerras@hkllaw.com

**PLEASE TAKE FURTHER NOTICE** that DIV OA requests, pursuant to Federal Bankruptcy Rule 2002 and 11 U.S.C. § 1109(b), that all notices, pleadings and orders required to be served in this case by any party be given to and served upon DIV OA through its above-named counsel.

**PLEASE TAKE FURTHER NOTICE** that this Notice of Appearance and Request for Service of Papers is not intended to constitute a waiver of (i) the right to have final orders in non-core matters entered only after *de novo* review by a District Judge, (ii) the right to trial by jury in any proceeding related to this case or any case, controversy, or proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this

Notice, (v) an election of remedies, or (vi) any other rights, claims, actions, defenses, setoffs, or recoupments as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Respectfully submitted,

HOLLAND & KNIGHT LLP

By: /s/ Lynne B. Xerras

Lynne B. Xerras (Mass. Bar No. 632441)  
10 St. James Avenue, 11<sup>th</sup> Floor  
Boston, MA 02116  
Tel: (617) 523-2700  
Fax: (617) 523-6850  
lynne.xerras@hklaw.com

Dated: December 11, 2024

**CERTIFICATE OF SERVICE**

I, Lynne B. Xerras, counsel to *DIV OA Lender, LLC* in connection with the above-captioned bankruptcy proceeding, hereby certify that on this 11th day of December, 2024, I served copies of the foregoing *Notice of Appearance and Request for Service of Papers* on all parties who are registered to received service through the Court's CM/ECF system.

/s/ Lynne B. Xerras